



September 28, 2006

**VIA HAND DELIVERY**

The Honorable Charles Terreni  
Chief Clerk/Administrator  
Public Service Commission  
of South Carolina  
101 Executive Center Drive  
Columbia, South Carolina 29210

Re: Petition of the Office of Regulatory Staff to Establish Dockets to Consider  
Implementing the Requirements of Section 1254 (Interconnection) of the  
Energy Policy Act of 2005  
Docket No. 2005-387-E

Dear Mr. Terreni:

Enclosed for filing, on behalf of South Carolina Electric & Gas Company, is the  
Direct Testimony of Philip R. Kleckley. Please accept the original and twenty-five (25)  
copies for filing. Additionally, please acknowledge your receipt of these documents by  
file-stamping the extra copy that is enclosed and returning it to me via my courier.

At the hearing on this matter, SCE&G will request that parties stipulate the  
testimony of Mr. Kleckley. If all parties of record are agreeable to the stipulation, Mr.  
Kleckley will not testify.

By copy of this letter, I am serving all other parties of record with a copy of the  
enclosed testimony and attach a certificate of service to that effect.

If there any questions regarding this matter, please do not hesitate to contact me.

With kind regards,

Catherine D. Taylor

OK OK Duke  
OK Duke

CDT/kms  
Enclosures

cc: Len S. Anthony, Esquire  
Lawrence B. Somers, Esquire  
Richard L. Whitt, Esquire  
Lara Simmons Nichols, Esquire

Shannon Bowyer Hudson, Esquire  
Nanette Edwards, Esquire  
William F. Austin, Esquire

CERTIFICATE OF SERVICE VIA MAIL

I hereby certify that on the 28<sup>th</sup> day of September, 2006, a copy of South Carolina Electric & Gas Company's PREFILED TESTIMONY OF PHILIP R. KLECKLEY was served upon the parties listed below by depositing a true copy thereof in the United States Mail at Columbia, South Carolina, in an envelope with adequate postage duly affixed and a return address clearly indicated thereon and addressed to:

Nanette S. Edwards, Esq.  
Office of Regulatory Staff  
PO Box 11263  
Columbia, SC 29211

Shannon Bowyer Hudson, Esq.  
Office of Regulatory Staff  
PO Box 11263  
Columbia, SC 29211

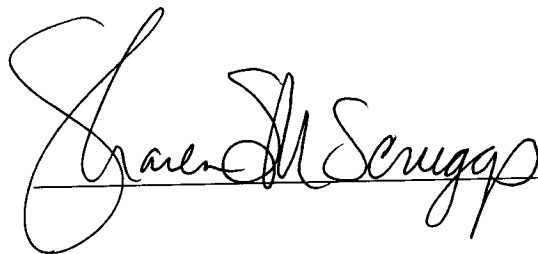
Richard L. Whitt, Esq.  
Austin, Lewis & Rogers, P.A.  
PO Box 11716  
Columbia, SC 29201

William F. Austin, Esq.  
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Lara Simmons Nichols, Esq.  
Associate General Counsel  
Duke Energy Corporation  
PO Box 1244, PBO5E  
Charlotte, NC 28201

Lawrence B. Somers, Esq.  
Assistant General Counsel  
Duke Energy Corporation  
PO Box 1244, PBO5E  
Charlotte, NC 28201

Mr. Len S. Anthony, Esq.  
Progress Energy Carolinas, Inc.  
PO Box 1551  
Raleigh, NC 27602

A handwritten signature in black ink, appearing to read "Lawrence B. Somers", written over a horizontal line.

Re: Petition to Establish Docket to Consider Implementing the Requirements of Section 1254  
(Interconnection) of the Energy Policy Act of 2005  
Docket No. 2005-387-E



1 primarily large generators which are connected to the bulk transmission system. Also, I  
2 have participated in the planning for small generator interconnections at distribution  
3 voltage levels. In addition, I have served on the SERC Generation/Load Connection  
4 Task Force.

5 **Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY IN THIS PROCEEDING?**

6 A. The purpose of my testimony is to support the Model Interconnection Standard  
7 that was jointly filed on June 5, 2006 in this docket by Carolina Power & Light Company  
8 d/b/a Progress Energy Carolinas, Inc. ("PEC"); Duke Power Company LLC d/b/a Duke  
9 Energy Carolinas LLC ("Duke Energy Carolinas"); and South Carolina Electric & Gas  
10 Company ("SCE&G"), to which I shall refer collectively as "the Utilities"; and by the  
11 South Carolina Office of Regulatory Staff ("ORS").

12 **Q. HAVE YOU REVIEWED THE TESTIMONY OF MITCH WILLIAMS,**  
13 **PROGRESS ENERGY, THAT WAS PREFILED IN THIS DOCKET?**

14 A. Yes.

15 **Q. DO YOU AGREE WITH AND SUPPORT MR. WILLIAMS' TESTIMONY?**

16 A. Yes, I do.

17 **Q. IS IT SCE&G'S POSITION, THEN, THAT THE COMMISSION SHOULD**  
18 **ADOPT THE MODEL INTERCONNECTION STANDARD AS JOINTLY FILED**  
19 **BY THE UTILITIES AND ORS?**

20 A. Yes it is.

21 **Q. DOES THIS CONCLUDE YOUR DIRECT TESTIMONY?**

22 A. Yes.